

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MALIBU MEDIA, LLC,)
)
Plaintiff,)
)
vs.) Case No.
) 5-19-CV-00834-DAE
JOHN DOE,)
)
Defendant.)
)

VIDEOTAPED ZOOM VIDEOCONFERENCE DEPOSITION OF
30 (B) (6) CORPORATE REPRESENTATIVE OF MALIBU MEDIA
COLETTE PELISSIER

Taken at 2 Bloomfield Hills Drive
Henderson, Nevada

On Tuesday, October 20, 2020
At 9:19 a.m.

Reported by: Deborah Ann Hines, CCR #473, RPR
HUDSON COURT REPORTING & VIDEO 1-800-310-1769

1 Appearances:

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(Via Zoom Videoconference)

7

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- and -

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16

CODY HALL

(Via Zoom Videoconference)

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1 THE VIDEOGRAPHER: Today's date is
2 October 20th, 2020. The time is 9:19 a.m. Pacific
3 time. We are beginning the deposition of Colette
4 Pelissier. Will counsel please announce for the
5 record who they represent.

6 MR. KHAZEN: Ramzi Khazen of the J.T. Morris
7 Law Firm on behalf of the defendant, John Doe.

8 MR. MORRIS: J.T. Morris also of J.T. Morris
9 Law, PLLC on behalf of defendant, John Doe.

10 MR. BEIK: Paul Beik, Beik Law Firm, PLLC on
11 behalf of plaintiff, Malibu Media.

12 THE VIDEOGRAPHER: Okay. Ms. Hines.

13 THE REPORTER: Due to COVID-19, will all
14 parties please stipulate to swearing in of the
15 witness remotely.

16 MR. BEIK: Yes.

17 MR. MORRIS: Yes.

18 THE WITNESS: Yes.

19 MR. KHAZEN: Yes.

20 THE WITNESS: What if we said no?

21 ///

22 ///

23 ///

24 ///

25 ///

1 Thereupon--

2 COLETTE PELISSIER

3 was called as a witness by the Defendant, and having
4 been first duly sworn, testified as follows:

5 EXAMINATION

6 BY MR. KHAZEN:

7 Q. Can you please introduce yourself for the
8 record?

9 A. My name is Colette Pelissier, C-o-l-e-t-t-e.
10 Last name P-e-l-i-s-s-i-e-r.

11 Q. And your address?

12 A. I'm the owner of Malibu Media. Malibu
13 Media, LLC and other, other companies and internet
14 companies.

15 Q. Your address?

16 A. My address is -- Paul, my business address?
17 Personal address? Which business?

18 MR. BEIK: Your business address.

19 THE WITNESS: My business, I have two
20 different business addresses right now. There's one
21 in California, and there would be -- I guess use the
22 business address at 2 -- where I am right now
23 actually would be a good business address. 2
24 Bloomfield Hills Drive in Henderson, Nevada and
25 89052.

1 A. Five years. I had a company that was
2 Colette Properties, but we had someone who, you know,
3 went trying to steal property from there, so that I
4 think has been -- is inactive.

5 Colette Productions where we were trying to
6 separate the production of Malibu Media, but that --
7 we -- that has been defunct now for quite some time,
8 so it's now just Malibu Media.

9 And -- and then there was one called Colette
10 Holdings, but that, again, we got involved with an
11 attorney that got greedy and so ultimately no longer.
12 So that would -- if that answers your question.

13 Q. What was the first one you mentioned? You
14 mentioned there was a first one, I couldn't quite --

15 A. Oh, Colette Properties.

16 Q. Colette Properties?

17 A. Yeah, but it had nothing to do with Malibu
18 Media.

19 Q. So the companies in which you have held a
20 stake over the last five years that you're aware of
21 are Click Here, Zo Digital, Colette Productions,
22 Colette Holdings, and Colette Properties. Are there
23 any others?

24 A. That would be -- that would be it as far
25 as -- again, I have to check with my accountant. I

1 do not know exactly how they're filing everything,
2 but I believe everything is going to be funneled into
3 Malibu Media so there's no confusion, so that's the
4 best answer I can give you.

5 And I, again, I have to check with my
6 accountant. I didn't know I was going to be going
7 through all the LLCs because I thought Malibu Media
8 was the only thing that was relevant here.

9 Q. And what do you mean everything is going to
10 be funneled into that? What do the holding companies
11 hold? What do they hold?

12 A. So we have some other -- we have other
13 websites where we have only just started copyrighting
14 the content. Super Hot and Colette.com and other
15 websites that we actually -- your client may have
16 infringed on but we wouldn't be -- that wouldn't be
17 relevant here because we haven't been enforcing those
18 copyrights so they would give to somebody would be
19 holding other websites like that.

20 Q. Do any of these companies hold any
21 copyrights that have ever been displayed on XR?

22 A. No.

23 Q. How many employees does Malibu have?

24 A. Excuse me?

25 Q. How many employees does Malibu Media have?